

EXHIBIT C

Michael P. O'Loughlin - Vol. I
August 31, 2021

Allan Chiocca vs.
The Town of Rockland, et al.

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1 knowing Allan as being -- being the type, you know,
2 Allan is. You know, he's a guy's guy. He was a
3 macho guy, and he was -- I didn't perceive him as
4 being the type that would be, you know, easily
5 convinced or under the impression that he was going
6 to lose his -- his contract on that night.
7 Q. Okay.
8 A. The point of having the report was to get
9 both sides on the record, and I didn't make a
10 decision until the report had been concluded. And I
11 used the report, and I used the weight of what the
12 women at town hall said, and then I fell back on --
13 on knowing Allan, and knowing -- knowing that, you
14 know, this is a guy that stands up to the selectmen.
15 This is a guy, as I testified earlier, he stood up
16 to me when I asked for something to be done in the
17 town and he went off. He doesn't -- he didn't seem
18 to be that guy that I was reading about in that
19 report.
20 Q. Did you say to Allan, "If you don't do
21 something for me, I'm not going to vote for your
22 contract"?
23 A. I never did, no.
24 Q. You don't know how he would react with that

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1 type of threat, do you?
2 A. That's -- that's --
3 MR. CROTTY: Objection.
4 A. -- fair to say.
5 But Allan also knew that he had three to
6 five. He had the majority of the board.
7 Q. Well --
8 MS. CIESLAK: I'm going to put on the
9 record real quick, I saw Tara and Jason both object,
10 even though I didn't hear it. So I'm making sure
11 the objection's on the record.
12 MS. DUNN: Thank you.
13 MR. CROTTY: You couldn't hear my
14 objection, either?
15 A. I heard Jason's.
16 THE REPORTER: I heard Jason's.
17 MS. CIESLAK: Okay.
18 BY MR. SHAFRAN:
19 Q. So you testified earlier that at the time
20 you voted to retain Regina Ryan you understood that
21 Allan was alleging that Deirdre had threatened his
22 contract to get him to engage in the sexual conduct,
23 right?
24 A. Correct.

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1 Q. You understood that Allan was making that
2 allegation before you voted to retain Regina, right?
3 A. Correct.
4 Q. And --
5 A. Correct.
6 Q. And everything that you just described
7 about Allan's personality you knew at the time you
8 made that vote, right?
9 A. Everything I knew about Allan I knew before
10 I made that vote. But --
11 Q. Right.
12 A. But I had to see the facts of that night.
13 I had to see the facts of the investigation,
14 everything -- everything that came out in that
15 report. I had to see it.
16 Because, you know, depending on what my
17 thoughts are, you know, there's other -- I mean,
18 there's contributing factors. I mean, I don't
19 know -- I didn't know exactly what occurred. None
20 of us were there. Only Allan and Deirdre were
21 there. None of us knew exactly what occurred. So
22 it's incumbent on us -- a complaint is made by one
23 side; a complaint is made by another side, you know.
24 So it's incumbent on us to follow up and investigate

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1 those complaints.
2 Whether I guess, maybe subconsciously, I
3 probably questioned it from the start, you know,
4 Deirdre sexually harassing Allan, because I knew
5 Allan, you know. But I had to see on paper, you
6 know, what exactly transpired, what was said, how
7 was -- you know, how was it said. You know, I mean,
8 was it -- I don't know.
9 I mean, I don't recall exactly where my
10 mindset was, but I know -- I know, like I said,
11 Allan -- Allan was a friend of mine, and I knew -- I
12 knew how Allan was, and I felt it necessary to
13 launch the investigation, to investigate both sides,
14 whether or not -- whether or not I agreed with
15 either one of them or any of them.
16 Q. Well, let me ask you this:
17 You said you knew what Allan was alleging
18 when you voted for Regina Ryan?
19 A. Right.
20 Q. And you knew everything you knew about
21 Allan's personality when you voted for the
22 investigation.
23 Do you recall posting on Facebook after the
24 investigation started that no matter what the